

Laura Vartain Horn (SBN 258485)
KIRKLAND & ELLIS LLP
555 California Street,
San Francisco, CA 94104
Telephone: (415) 439-1400
laura.vartain@kirkland.com

Jessica Davidson (Admitted *Pro Hac Vice*)
Christopher D. Cox (Admitted *Pro Hac Vice*)
KIRKLAND & ELLIS LLP
601 Lexington Avenue
New York, NY 10022
Telephone: (212) 446-4800
jessica.davidson@kirkland.com
christopher.cox@kirkland.com

Allison M. Brown (Admitted *Pro Hac Vice*)
KIRKLAND & ELLIS LLP
2005 Market Street, Suite 1000
Philadelphia, PA 19103
Telephone: (215) 268-5000
alli.brown@kirkland.com

Attorneys for Defendants
UBER TECHNOLOGIES, INC.;
RASIER, LLC; and RASIER-CA, LLC

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

IN RE: UBER TECHNOLOGIES, INC.,
PASSENGER SEXUAL ASSAULT
LITIGATION

This Document Relates to:

ALL ACTIONS

Case No. 3:23-md-03084-CRB (LJC)

**DECLARATION OF CHRISTOPHER V.
COTTON**

Judge: Hon. Charles R. Breyer
Courtroom: 6 – 17th Floor

1 I, Christopher V. Cotton, declare as follows:

2 1. I am an attorney at Shook, Hardy & Bacon L.L.P., counsel of record for Defendants Uber
3 Technologies, Inc., Rasier, LLC, and Rasier-CA, LLC (collectively, “Uber” or “Defendants”). I offer this
4 Declaration in the above-captioned matter in support of Uber’s Motion for (1) Entry of an Order to Show
5 Cause Why 6 Plaintiffs Who Have Submitted Non-Bona-Fide Receipts Should Not Be Dismissed with
6 Prejudice, and (2) Allowing Limited Depositions of 5 Plaintiffs Referenced Herein (the “Fourth
7 Fraudulent Receipts Motion”).

8 2. Attached as Exhibit 1 is a true and correct copy of a bona fide, itemized receipt from Uber’s
9 systems for a ride that occurred on November 9, 2023, and totaled \$23.38.

10 3. Attached as Exhibit 2 is a purported receipt submitted by Plaintiff with MDL ID 4097.

11 4. Attached as Exhibit 3 is a purported receipt submitted by Plaintiff with MDL ID 3962.

12 5. Attached as Exhibit 4 is a purported receipt submitted by Plaintiff with MDL ID 3286.

13 6. Attached as Exhibit 5 is a purported receipt submitted by Plaintiff with MDL ID 2785.

14 7. Attached as Exhibit 6 is a purported receipt submitted by Plaintiff with MDL ID 4142.

15 8. Attached as Exhibit 7 is a purported receipt submitted by Plaintiff with MDL ID 4358.

16 9. Attached as Exhibit 8 is a true and correct copy of a bona fide, itemized receipt from Uber’s
17 systems for a ride that occurred on January 25, 2024, and totaled \$13.74.

18 10. Attached as Exhibit 9 is a true and correct copy of a bona fide, itemized receipt from Uber’s
19 systems for a ride that occurred on February 2, 2024, and totaled \$15.50.

20 11. Attached as Exhibit 10 is a true and correct copy of a bona fide, itemized receipt from
21 Uber’s systems for a ride that occurred on August 13, 2024, and totaled \$21.97.

22 12. Attached as Exhibit 11 is a purported receipt submitted by Plaintiff with MDL ID 3700.

23 13. Attached as Exhibit 12 is a true and correct copy of a bona fide, itemized receipt from
24 Uber’s systems for a ride that occurred on August 30, 2024, and totaled \$15.81.

25 14. Attached as Exhibit 13 is a purported receipt submitted by Plaintiff with MDL ID 3879.

26 15. Attached as Exhibit 14 is a true and correct copy of a bona fide, itemized receipt from
27 Uber’s systems for a ride that occurred on August 31, 2024, and totaled \$17.75.

28 16. Attached as Exhibit 15 is a purported receipt submitted by Plaintiff with MDL ID 3698.

1 I declare under penalty of perjury under the laws of the United States of America that the foregoing
2 is true and correct.

3
4 Dated: January 7, 2026

Respectfully submitted,

5
6 By: /s/ Christopher V. Cotton

7 Christopher V. Cotton (admitted *Pro Hac Vice*)
8 **SHOOK, HARDY & BACON L.L.P.**
9 2555 Grand Blvd.
10 Kansas City, MO 64108
11 Telephone: (816) 474-6550
12 cctotton@shb.com

13
14 *Attorney for Defendants*
15 UBER TECHNOLOGIES, INC.;
16 RASIER, LLC; and RASIER-CA, LLC
17
18
19
20
21
22
23
24
25
26
27
28

FILER'S ATTESTATION

I am the ECF User whose ID and password are being used to file this document. In compliance with Civil Local Rule 5-1(i)(3), I attest that the signatory above concurred in this filing.

Dated: January 7, 2026

/s/ Laura Vartain Horn
Lauran Vartain Horn